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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 70-734
License No.: SNM-696
Report No.: 70-734/97-03
Licensee: General Atomics (GA)
Facility: Torrey Pines Mesa and Sorrento Valley Sites
Location: San Diego, California
Dates: May 19-23, 1997
Inspectors: C. A. Hooker, Senior Fuel Facility Inspector
F. A. Wenslawski, Chief, Materials Branch (May 22-23, 1997)
Approved By: Frank A. Wenslawski, Chief
Materials Branch
Attachment: Supplemental Inspection Information

EXECUTIVE SUMMARY

General Atomics NRC Inspection Report 70-734/97-03

This inspection included a review of current operations, radiation protection, radiological effluents, environmental protection, transportation, and solid radioactive waste management and storage related to the licensee's possession-only license and decommissioning activities.

Operations Review

- The licensee was adequately implementing the requirements of its Hot Cell Facility (HCF) Decommissioning Plan (Section 1.1).
- Although appropriate surveys were being made of equipment removed from Building 39, the absence of appropriate information on equipment release logs indicated a lack of attention to detail and less than adequate supervisory review of such documents. Also, a matter involving calibration of air samplers represented a lack of attention to detail (Section 1.2).
- The storage of special nuclear materials (SNM) was in accordance with the licensee's criticality safety analyses and regulatory requirements. The licensee was maintaining adequate control and security of stored SNM (Section 1.3).

Radiation Protection

- The licensee was adequately controlling radiation exposures to workers and members of the public (Section 2).

Radioactive Effluents

- The licensee was adequately controlling radioactive effluent releases and effluent releases appeared as low as is reasonably achievable ALARA (Section 3).

Environmental Protection

- The licensee's environmental sampling data indicated that offsite effluent releases were adequately controlled and well below regulatory requirements (Section 4).

Transportation of Radioactive Materials

- The licensee was adequately implementing the applicable regulatory requirements for shipping radioactive materials. However, observations related to administrative errors on shipping documents represented a need for improvement in the final review of such documents (Section 5).

- The licensee's self assessments appeared effective in identifying and correcting deficiencies (Section 5).

Solid Radioactive Waste Management and Storage

- The licensee's self assessments appeared effective in identifying and correcting deficiencies (Section 6).
- Personnel were adequately trained and qualified for their assigned tasks (Section 6).

Report Details

Summary of Facility Status

All production and research activities involving the use of SNM have been discontinued, consistent with the licensee's letter dated September 30, 1996. By letter dated September 30, 1996, the licensee submitted a Site Decommissioning Plan, which is undergoing NRC review.

Current licensed activities consisted of decontamination and decommissioning (D&D) of the Building 23 HCF under an NRC approved decommissioning plan specific to the HCF. There were no ongoing activities in the TRIGA Fuel Fabrication Facility (TFFF). At Building 39 (modular helium reactor pilot facility) in Sorrento Valley, the licensee was identifying and removing equipment for either disposal or disposition to the Department of Energy (DOE) and/or other tentative destinations in preparation for final facility characterization and upcoming D&D activities.

1 Operations Review

1.1 Building 23 HCF

a. Inspection Scope (88104, 88020, and 83822)

The inspectors toured HCF with cognizant licensee personnel to discuss and observe ongoing activities and evaluate decommissioning activities. The inspectors also reviewed the establishment of decommissioning procedures and selected records to evaluate the current status of the facility.

b. Observations and Findings

The inspectors noted that the licensee maintained a comprehensive set of procedures for all aspects of decommissioning and waste disposal activities at the HCF. These procedures were noted to be current and consistent with the status of the facility. These procedures also include weekly and monthly inspections of the facility to assure that the applicable safety systems were being maintained operational. The inspectors did not identify any decommissioning activity that was not being covered by a current procedure or any inconsistencies with the commitments in the HCF Decommissioning Plan. Personnel access to the facility was well controlled. Management and supervisory personnel were directly involved with D&D activities.

The inspectors noted that non-essential equipment exterior and interior of the hot cells had been removed, including all remote handling equipment from the hot cells. The equipment had either been packaged as radioactive waste or properly transferred to an authorized recipient. The licensee had removed the lead glass

window from the metalography cell and preparations were underway to remove the lead windows from the low-level and high-level hot cells.

Recent surveys showed that the maximum dose rates in the metalography cell ranged from 0.2 millirem per hour (mrem/hr) to 2.0 mrem/hr. Wipe tests indicated a nominal average for removable contamination of 2,000 disintegrations per minute (dpm) beta-gamma for large area wipes and no detectable alpha contamination.

Regarding the low-level and high-level hot cells, all of the paint had been stripped (vacuum blasted) from the inner surfaces. With the paint removed, the use of strippable paint and other cleaning techniques on the exposed metal surfaces had greatly reduced the general dose rates and contamination levels inside the hot cells. Laboratory analyses of wipe tests continue to indicate that Co-60, Cs-134 and 137, and Sr-90 (all licensed by the State of California) are the major contributors of the radiation exposure levels and loose contaminants in the HCF.

Hot spot dose rates at the lips of the storage wells and floor drains inside the high-level hot cell exhibited contact dose rates of 50 mrem/hr to 500 mrem/hr (gamma). The general working dose rates ranged from 5 to 20 mrem/hr. The licensee expected that the loose contamination levels would be less than 3,000 dpm per 100 square centimeters (dpm/100 cm²) for beta activity for the window removal operation. Currently alpha activity is not routinely detected. The nominal average beta to alpha ratio observed on surveys of removable contamination on hot cell equipment removed in March 1997 was approximately 700 to 1, with the alpha constituent being typically less than 100 dpm/100 cm². The air-sampling data from hot cell decontamination activities also indicated similar high beta to alpha ratios, with mixed fission products being the controlling radionuclides.

Although there is no accountable SNM remaining in this facility, the licensee was maintaining the criticality monitoring system operational until an appropriate assessment can be made of any potential SNM in non-accessible portions of the drain and ventilation systems. As applicable, the licensee was adequately maintaining its fire sprinkler system and high-efficiency particulate air (HEPA) exhaust system. With the exception of a buildup of cardboard boxes and similar combustibles in the boiler room, housekeeping was generally adequate. The licensee acknowledged the condition of the boiler room and planned a general cleanup of the area.

c. Conclusions

The licensee was adequately implementing the requirements of its HCF decommissioning plan. Applicable safety systems were being maintained operational and security of radioactive materials was evident.

1.2 Building 39 (Modular Helium Reactor Pilot Facility)

a. Inspection Scope (88104, 88020, and 83822)

The inspectors toured the facility with cognizant licensee personnel to discuss and observe ongoing activities. The inspectors also reviewed selected survey records of equipment released for unrestricted use and selected licensee procedures.

b. Observations and Findings

The inspectors noted that most of the process and associated auxiliary equipment had either been packaged for radioactive waste disposal or for transfer to authorized recipients. Equipment identified as non-contaminated was being released for unrestricted use for disposal at a local landfill or transferred to other facilities. No equipment removal was in progress during the tour.

Although the SNM inventory was less than 150 grams U-235 (primarily counting standards), the criticality monitoring system was being maintained operable until an appropriate assessment can be made of any potential SNM in non-accessible portions of the ventilation systems. The inspectors also noted that the HEPA exhaust ventilation system and fire sprinkler system were being maintained operable. Housekeeping appeared adequate and the general working areas in the facility were being kept free of any removable contamination.

During a tour of the facility, the inspectors noted that the calibration tags on all of the air-flow meters for fixed area samplers showed a calibration date of July 1995 and a due date of July 1996. Further review of this matter disclosed that Section 6.12 of Health Physics Procedure No. 45, "Airborne Evaluations," stated that air-flow meters are to be calibrated biennially. None of the air-flow meters were past due for calibration as required by this procedure. The calibrations are performed by the quality systems department. From discussions with cognizant licensee personnel, it appeared that the reduced calibration frequencies as identified on the calibration tags was due to the latitude of the workload of the individual performing the calibrations at the time. Congruous with reduction in staffing, this individual's employment was terminated in March 1996 and the calibration task was turned over to another individual. According to the technician currently performing the calibrations, a handed down calibration listing did not readily identify when calibrations were due and he relied on the health physics technicians to inform him when calibrations were needed to be performed. The inspectors considered that there was ample opportunity for the licensee to identify the problem through its weekly air sample changes as the calibration tags were conspicuous. Relative to this issue, the quality systems department initiated steps to establish a formalized system to ensure that the airflow meters would be calibrated when due.

During a review of survey records of equipment released for unrestricted use for the past five months, the inspectors noted that four of six equipment and material

release log forms for this period either lacked information specified on the form or appropriate nomenclature was not adequately applied. Two release log forms did not provide any information as to the survey instrument used, and one of the two lacked dates of items surveyed and the signature of the surveyor. One form did not provide the survey instrument calibration due date. On two forms "N/A" was used and another form "= BKG" was used as opposed to providing the activity (dpm/100 cm²) level for both fixed and removable contamination measurements. This matter was discussed with the health physics supervisor who acknowledged the inspectors' concern relative to the lack of attention to detail in documenting appropriate information on the release log forms. This also indicated a less than adequate supervisory review of equipment release records.

Also related to the release of equipment for unrestricted use, the licensee had issued a set of instructions on the survey methods and release criteria to ensure that items surveyed meet the NRC and State guidelines for release to unrestricted use. The inspectors discussed the appropriateness of including these instructions either in an approved health physics procedure or including them with the approved work authorization for the facility. The health physics supervisor acknowledged the inspectors' observation.

c. Conclusions

Applicable safety systems were being maintained operational and security of radioactive materials was evident. Although appropriate surveys were being made of equipment removed from the facility, the absence of appropriate information indicated a lack of attention to detail and less than adequate supervisory review of equipment release records. Also, the matter involving the calibration of the air samplers represented a lack of attention to detail.

1.3 Other Facilities

a. Inspection Scope (88104 and 88020)

The inspectors toured the TFFF, and main site storage vault and the facility where two casks containing irradiated fuel removed from the HCF are stored to observe the material condition of these facilities.

TFFF

There were no ongoing activities at the TFFF, Building 22. The facility remains shut down and void of processing equipment. The licensee had intended to have all of the remaining TRIGA fuel removed from the vault by the end of June 1996. However, final foreign approval of the shipping containers for transporting some of the TRIGA fuel to France and authority to disposition some TRIGA fuel elements to other foreign countries had been delayed. Also, disposition of scrap fuel materials had taken longer than the licensee had anticipated. With expected imminent

approvals, the licensee had packaged the fuel intended for shipment and had plans to relocate the scrap material to the main site vault for temporary storage until ultimate disposal. The licensee anticipated that the fuel would be removed from the vault within a month.

The inspectors noted that the criticality system was being maintained fully operational and was within its current calibrated period. The storage of SNM materials was in accordance with the licensee's criticality safety analyses and adequately secured. SNM storage containers were stored in accordance with the licensee criticality safety analysis and license requirements. All applicable safety systems were being maintained fully operational.

Regarding decommissioning, by letter dated May 22, the licensee submitted a notice of intent to commence decommissioning of the TFFF. Based on the results of the licensee's radiological characterization, the licensee expects that minimal decontamination will be required to meet the criteria for unrestricted use. The licensee's objective is to obtain a release of the facility for unrestricted use without significant facility dismantlement.

Main Site Storage Vault

There were no ongoing activities in the main site SNM vault. The licensee had transferred considerable source material and archived SNM to the DOE for disposal. The current predominate inventory of SNM consisted of 15 TRIGA fuel rod shipping containers packaged and awaiting shipment to an authorized foreign recipient. The inspectors noted that the SNM materials were stored in accordance with the licensee's criticality safety analysis and license requirements. No concerns were identified by the inspectors.

Irradiated Fuel Storage Facility

This facility contains two storage casks containing small quantities of irradiated fuel that had been previously stored at the HCF. The material is being stored until it can be transferred to a DOE facility. The inspectors noted that no other items were stored in the area and adequate security controls were in place. While touring the area, the inspectors observed the licensee performing its monthly response and alarm test of the criticality monitoring system for this area. The criticality monitoring system functioned as designed and no concerns were identified by the inspectors.

Non-Impacted Facilities

By letter dated April 10, 1997, the licensee submitted to the NRC a request for release of "Non-Impacted" GA facilities and surrounding land areas to unrestricted use. The request provided a listing of buildings where radioactive materials have never been used and have been isolated from areas where any activities involving

the use of radioactive material have been conducted. The non-impacted buildings and associated land areas are located on the main site (Torrey Pines Mesa), and some of the raw land is located adjacent to the Sorrento Valley facilities. During the inspection, the inspectors toured several of the subject buildings and viewed the land areas involved with the licensee's request. Comments relative to observations made during these tours have been provided to the NRC licensing project manger.

c. Conclusions

The storage of SNM materials was in accordance with the licensee's criticality safety analyses and regulatory requirements. The licensee was maintaining adequate control and security of stored SNM. No safety concerns were identified.

2 Radiation Protection

a. Inspection Scope (88104 and 83822)

NRC Inspection Report 70-734/96-04, dated January 7, 1997, describes the previous inspection of this area. This inspection (70-734/97-03) was focused on the review of the licensee's 1996 personnel exposure data and observations made during facility tours.

b. Observations and Findings

Due to reduced site activities during the past 2 years, internal and external exposures have been minimal. The maximum individual deep dose equivalent from external exposure for 1996 was 0.535 rem. This exposure was associated with D&D activities at the HCF where the external exposure contributor is byproduct material licensed by the state. Only one individual had an intake of radioactive material that required an assigned committed effective dose equivalent which was 0.013 rem. Considering the high radiation and contamination levels encountered during the initial decontamination process in the hot cells at the HCF, workers radiation exposures were being maintained ALARA.

The licensee's evaluation of 1996 doses to members of the public (includes onsite tenants) from direct radiation levels at various site locations was estimated to be less than 12 percent of the 10 CFR 20.1301 annual dose limit of 0.1 rem, using the methodology permitted by 10 CFR 20.1302(b)(1). No concerns were identified with the licensee's evaluations.

During facility tours, the inspectors observed that workers were dressed in appropriate protective clothing. Survey instruments in use appeared operational and within their current calibration period. The inspectors also noted that radioactive materials and radiation areas were posted in accordance with the requirements delineated in 10 CFR Part 20.

c. Conclusions

The licensee was adequately controlling radiation exposures of workers and to members of the public. Radiation exposures related to hot cell D&D activities appeared ALARA.

3 Radioactive Effluents

a. Inspection Scope (88104 and 88035)

Selected records of radioactive effluent discharges and the licensee's semiannual effluent reports for 1996 dated August 28, 1996, and February 14, 1996, were reviewed.

b. Observations and Findings

The inspectors noted that the licensee had not made any radioactive discharges to the sanitary sewer system during the past year. Although the licensee had intended to make discharges of HCF liquid waste from the Building 25 radioactive waste processing facility to the San Diego city sewer system, laboratory analyses indicated that the licensee was unable to meet the solubility criteria specified in 10 CFR Part 20.2003 for releases to the sanitary sewer system. Currently, radioactive liquids were either being solidified and/or absorbed in an approved media for disposal as solid waste.

The licensee's semiannual effluent reports for 1996 were submitted in accordance with 10 CFR 70.59 and provided a summary of the radioactive gaseous and liquid effluents released from each of the licensee's facilities. Releases of radioactive liquids were well below the applicable limits specified in 10 CFR Part 20, Appendix B. No errors or anomalies were identified in the report.

The licensee's calculated annual dose for 1996 gaseous effluent discharges was less than 0.5 mrem to the maximally exposed tenant/public location. This dose was calculated using Environmental Protection Agency "COMPLY" computer code.

The review of licensee's gaseous effluent data from January 1 through May 1, 1997, indicated that releases were typically less than 10 percent of the 10 CFR Part 20, Appendix B, Table 2, Column 1 limit for Class Y uranium compounds.

c. Conclusions

The licensee was adequately controlling radioactive effluent releases and effluent releases appeared ALARA.

4 Environmental Protection

a. Inspection Scope (88104 and 88045)

Selected licensee procedures and records of environmental sampling were reviewed and discussed with cognizant licensee personnel.

b. Observations and Findings

The licensee's procedures and environmental sampling program were consistent with the requirements delineated in Part II, Section 6 of the license for: (1) the required type of samples to be collected (air, water, sewage, soil, vegetation, and external gamma radiation), (2) the minimum detection sensitivity required for sample analysis, and (3) the number of sampling sites.

The licensee's environmental measurement data indicated that there were no effluent releases of radioactive materials that, collectively, would have a negative impact on the environment or general public. The inspector noted that most of the sample analytical results were less than, or slightly above, the detection limit and/or established background concentrations. Samples that exceeded licensee established alert levels were adequately evaluated.

c. Conclusions

The licensee's environmental sampling data indicated that offsite effluent releases were adequately controlled and well below regulatory requirements.

5 Transportation of Radioactive Materials

a. Inspection Scope (88104 and 86740)

The inspection of this area included discussions with cognizant licensee personnel and a review of records of selected domestic and overseas shipments of SNM, procedures related to shipments of radioactive materials, related Quality Assurance (QA) audits, and personnel training.

b. Observations and Findings

Shipments of SNM have primarily involved the licensee depleting its inventory of previously manufactured TRIGA fuel rods to the intended customers (foreign and domestic), TRIGA fuel standards to its French consort, and disposal of SNM materials as waste. Most of these shipments have taken place during the past 3 months.

The inspectors noted that the licensee had revised its procedures to incorporate the International System of Units (SI units) and had implemented the use of SI units as

required by 49 CFR 172.203 (d)(4), effective April 1, 1997. As applicable, the licensee maintained current copies of NRC Certificate of Compliance certifications and Competent Authority Certifications for foreign shipments. The licensee's shipping records indicated that transfers of SNM were conducted in accordance with the requirements delineated in 10 CFR 70.42, and the transport regulatory requirements of 10 CFR Part 71 and 49 CFR Parts 171 through 189 were being met.

Although the licensee was adequately implementing the regulatory requirements for transporting radioactive material, the inspectors noted some administrative errors. In one case, the shipping paper for a waste shipment to a DOE facility displayed customary units (millicurie) in first order as opposed to the SI units.

49 CFR 172.203 (d)(4) allows the use of customary and SI units, but the SI units must be displayed first. Another matter involved an incorrect statement made by a broker on an airway bill for a foreign shipment that delineated the form of material as special form when the applicable attached "Shippers Declaration for Dangerous Goods" properly classified the shipment as fissile material. The licensee acknowledged these observations and informed the inspectors that a second party review system would be instituted to preclude similar errors.

QA Audit No. 96015, "Audit of Nuclear Material Accountability Shipping," dated February 14, 1997, was conducted during December 13 -20, 1996, to verify the requirements defined in the licensee's NRC approved QA program. The audit identified two findings where corrective actions were required. These findings were in the area of nuclear material and accountability and corrective actions relative to the findings appeared appropriate. QA audits related to transportation activities related to radioactive waste shipments are discussed in Section 6 below.

The review of selected training records indicated that personnel had received training relative to their functional assignment and duties associated with transportation of radioactive materials. Some of this training involved key site personnel attending professional courses provided by the DOE. No concerns were identified with the qualification of personnel involved with shipping radioactive materials.

c. Conclusions

The licensee was adequately implementing the applicable regulatory requirements for shipping radioactive materials. However, the observations related to the administrative errors on shipping documents represented a need for improvement in the final review of such documents. The licensee's self assessments appeared effective in identifying and correcting deficiencies.

6 Solid Radioactive Waste Management and Storage

a. Inspection Scope (88104, 84850 and 84900)

The inspection of this area included discussions with cognizant personnel and a review of selected licensee documents associated with radioactive waste handling, packaging, and waste disposal shipping manifests. The inspection also included tours of the licensee's waste storage and processing facilities.

b. Observations and Findings

There had been no major changes in the licensee's radioactive waste handling program during the past year. Radioactive waste generated at the HCF was being managed and shipped to the DOE's Hanford waste disposal facility by the HCF staff. Waste generated from Building 39 activities and other GA facilities were being processed through the Nuclear Waste Processing Facility (NWPF) located at the Sorrento Valley site. Most wastes received at the NWPF are characterized at the source of generation. During the inspection, the inspectors noted that the licensee had intended to make a shipment of waste to the Barnwell, South Carolina burial site in the near future. This would be the licensee's first waste shipments to a commercial burial site in the past 2 years. Generally, radioactive and mixed wastes generated from the onsite decontamination and decommissioning activities are transferred to DOE waste burial sites.

Since most of the radioactive and mixed waste generated by onsite D&D activities is accepted at DOE disposal facilities, there were no apparent onsite waste storage problems. Waste packaged for ultimate disposal was neatly stored and protected from unauthorized removal.

The review of the licensee's program indicated that radioactive waste shipments sent for disposal were being classified pursuant to 10 CFR 61.55, and were characterized in accordance with 10 CFR 61.56. Audits, quality control inspections, preparation of waste manifests, marking of packages, and waste handling were in accordance with the requirements delineated in 10 CFR 20, Appendix F and the licensee's procedures.

QA Audit No. 96023, "Low-Level Radioactive Waste Disposal Projects," dated September 10, 1996, was conducted during August 1-19, 1996, to verify that project and support personnel were effectively implementing the quality assurance requirements applicable to the preparation and shipment of solid low-level radioactive waste to the Nevada Test Site. This in-depth audit included waste disposal activities at Building 39, the NWPF, and waste that had been generated at the TFFF. This in-depth audit identified five findings involving deficiencies that required corrective actions. The findings primarily involved work instruction content, lack of familiarization with procedures, identification of items, and the management of records. Relative to this audit, a followup QA audit was performed

on March 18 through April 3, 1997. The followup audit verified that all of the deficiencies identified in the initial audit had been corrected and no new deficiencies were identified.

QA Audit No. 96008, "Audit of the Hot Cell Decontamination and Decommissioning Project," dated November 5, 1996, conducted during September 19 through October 10, 1996, was performed to verify that project and support personnel were effectively implementing the quality assurance requirements related to packaging and disposal of radioactive waste associated with D&D activities. This in-depth audit did not identify any findings requiring corrective action.

Based on the review of selected training records and discussions with licensee personnel, no concerns were identified with the qualification of personnel involved with waste processing, packaging, and shipping.

C. Conclusions

The licensee's waste packaging and shipping activities were consistent with the applicable regulatory requirements and licensee procedures. The licensee's self assessments appeared effective in identifying and correcting deficiencies.

Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on May 23, 1997. The licensee acknowledged the findings presented.

Although proprietary information was reviewed during this inspection, such information is not knowingly described in this report.

ATTACHMENT

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

K. E. Asmussen, Director, Licensing, Safety and Nuclear Compliance
V. J. Barbat, Manager, Engineering and Maintenance, Hot Cell Decommissioning
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V. Nicolayeff, Manager, Environmental Quality Assurance
R. C. Noren, Director of Fuel Fabrication
D. Pettycord, Manager Quality Systems
C. L. Wisham, Manager, Nuclear Materials Accountability

INSPECTION PROCEDURES USED

IP 83822: Radiation Protection
IP 88020: Management Organization and Controls
IP 88035: Radioactive Waste Management
IP 88045: Environmental Protection
IP 88104: Decommissioning Inspection Procedure for Fuel Cycle Facilities
IP 84850: Waste Generator Requirements
IP 84900: Low-level Waste Storage
IP 86740: Inspection of Transportation Activities

LIST OF ACRONYMS USED

ALARA	as low as is reasonably achievable
cm ²	square centimeters
D&D	decontamination and decommissioning
DOE	Department of Energy
dpm	disintegrations per minute
GA	General Atomics
HCF	Hot Cell Facility
HEPA	high-efficiency particulate air
mrem/hr	millirem per hour
NWPF	Nuclear Waste Processing Facility
QA	quality assurance
SI	International System of Units
SNM	special nuclear material
TFFF	TRIGA Fuel Fabrication Facility